

RECEIVED
AUG 26 2013
8:30
WILLIAM T. WALSH, CLERK

August 19, 2013

Via U.S.P.S. First Class Mail, CMRRR

U.S. District Court for the District of New Jersey
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07101

Re: Objection to Class Settlement in *Rossi v. The Procter & Gamble Company*, Civil Action No. 11-CV-7238 (JLL)(MAH)

Dear Clerk:

Please accept this letter as my filing with the Court of my objections to the proposed class action settlement, including the award of attorneys' fees to class counsel, in the above referenced class action lawsuit. The proponents of this settlement have not met their burden to show that the settlement is fair, reasonable, and adequate.

I am a member of the class because I am a person in the United States who purchased Crest Sensitivity Treatment & Protection from February 2011 through March 31, 2013. Attached is my claim form confirmation I received after submitting my claim form through the settlement website www.SensitivityToothpasteSettlement.com.

My name, address, and telephone are as follows:

Tim Blanchard
3710 Pope Drive
Corpus Christi, TX 78411
(361) 558-3477

I will not attend the fairness hearing.

Objection is made to attorneys' fees on basis of a lodestar or a percentage of recovery analysis. Further objection is made to the extent of the failure of class counsel to make a detailed attorneys' fee and expense application within a reasonable and adequate amount of time for objectors to evaluate the fee and expense application. In the Class Action Settlement Agreement found on the settlement website, the parties state that class counsel will be awarded up to \$700,000 in fees. There is no basis from which to assess the fairness of these fees.

I object to the inadequacy of the information available in the notice and the settlement regarding attorneys' fees. Per the Preliminary Approval lass counsel was supposed to have made an application for attorneys' fees on August 9, 2013, but had that date extended to August 20, 2013. This was not enough time for the class to assessment the information that was to be provided about the attorneys' fees.

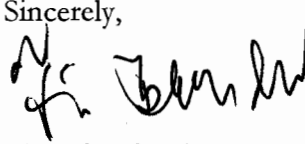
Objection is made to any procedures or requirements to object that require information or documents other than those that are contained herein to the extent that such requirements are unnecessary, unduly burdensome, are calculated to drive down the number and quality of objections to the settlement and violate objectors' due process rights.

I generally object to the proponents of the settlement not sustaining their burden of proof on commonality, predominance, superiority and adequacy of class counsel and class representatives under FRCP Rule 23.

I also join in and incorporate herein by reference any and all objections filed by other objectors as though set forth in full, to the extent not inconsistent with the specific objections made herein.

I am mailing my objections, as indicated above and below, to the court and to the attorneys identified in the notice as required recipients.

Sincerely,



Tim Blanchard

cc: **Via U.S.P.S. First Class Mail**

Lindsey H. Taylor
Donald E. Ecklund
CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO
5 Becker Farm Road
Roseland, New Jersey 07068

Scott A. Bursor
Joseph I. Marchese
BURSOR & FISHER, P.A.
888 Seventh Avenue, 3rd Floor
New York, New York 10019

Antonio Vozzolo
FARUQI & FARUQI, LLP
369 Lexington Avenue, 10th Floor
New York, New York 10017

Hugh Whiting
Kevin D. Boyce
JONES DAY
North Point
901 Lakeside Avenue

Cleveland, Ohio 44114

Jennifer L. Del Medico
JONES DAY
222 East 41st Street
New York, New York 10022

**DECLARATION OF TIM BLANCHARD IN SUPPORT OF OBJECTION TO
CLASS ACTION SETTLEMENT IN *ROSSI v. THE PROCTER & GAMBLE CO.***

Comes now TIM BLANCHARD and states the following under oath and under penalty of perjury in support of his objection:

"My name is Tim Blanchard. I am over the age of eighteen (18) years. I have never been convicted of a felony. I am qualified and competent to make this affidavit.

The facts stated herein are within my personal knowledge.

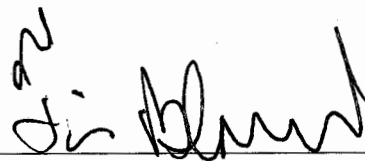
"My home address is 3710 Pope Drive in Corpus Christi, Texas 78411. My telephone number is (361) 558-3477. I am a resident of Corpus Christi, Texas.

"This declaration is made in support of my membership as part of the Settlement Class. I am a member of the class as a person in the United States who purchased Crest Sensitivity Treatment & Protection toothpaste from February 2011 through March 31, 2013 from area drugstores in the Corpus Christi area.

"I filed a claim form through the settlement website on August

"I object to the to Class Settlement in *Rossi v. The Procter & Gamble Company*, Civil Action No. 11-CV-7238 (JLL)(MAH) for the reasons stated in my objection.

"I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this the 19th day of August 2013, at Corpus Christi, Texas."

A handwritten signature in black ink, appearing to read "Tim Blanchard", written over a horizontal line.

Tim Blanchard

Your Claim has already been filed. DO NOT mail this Claim Form. This is for your records only.

Rossi v. Procter & Gamble Claims Administrator

c/o KCC Class Action Services

P.O. Box 43163

Providence, RI 02940-3163

Name/Address Changes (if any):

PGN



Claim #: PGN- 611634501
TIM BLANCHARD

3710 POPE DRIVE

CORPUS CHRISTI, TX 78411

First Name Last Name

Address

City State Zip

CLAIM FORM

I. Claimant Contact Information

Please print or type. Categories with an asterisk (*) are optional.

I, TIM BLANCHARD state as follows:
(First Name) (Last Name)

Telephone Number Day* (361) 558-3477 Telephone Number Night* _____

Email Address* timlssp@gmail.com

II. Identity of Claimant

Please check the appropriate box. Please attach information showing authority to submit claim if box other than Individual is selected.

☒ Individual ☐ Legal Representative of purchaser ☐ Other (please describe) _____

III. Certifications

I have read and am familiar with the contents of the Instructions accompanying this Claim Form and I certify under penalty of perjury that the information I have set forth in the foregoing Claim Form and in documents attached by me are true, correct and complete to the best of my knowledge. I certify that I purchased Crest Sensitivity Treatment & Protection Toothpaste (as shown in the image on the right) during the period February 2011 to the present, inclusive.)

I am not an officer, director, agent, servant or employee of the Procter & Gamble Company or any related entity thereof; a judge in this lawsuit; or an immediate family member of such persons; I did not purchase Crest Sensitivity Treatment & Protection for resale or distribution to others; and I have not requested exclusion from the Settlement.

I swear under penalty of perjury under the laws of the United States that all of the information provided on this Claim Form is true

and correct to the best of my knowledge this _____ day of _____, 2013.

/s/TIM BLANCHARD

Signature

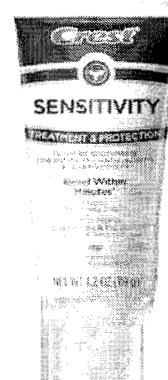
08/19/2013

Date

If the Claimant is other than an individual, or if the Claimant is not the person completing this form, the following must also be provided:

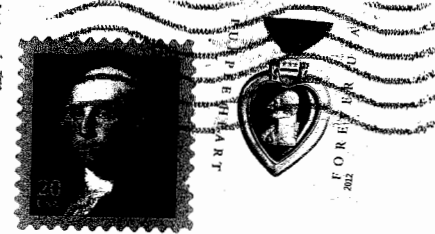
Name of person signing: _____ Date: 08/19/2013

Capacity of person signing: _____
(Executor, President, Trustee, etc.)



Tim Blanchard
3710 Pope Drive
Corpus Christi, TX 78411

CORPUS CHRISTI
TX 784 2 L
21 AUG 2013 PM



U.S. District Court for the District of New Jersey
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07101

0710233595

